

EXHIBIT M

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
PRESCRIPTION) MDL No. 2804
5 OPIATE LITIGATION)
Case No.
6 THIS DOCUMENT RELATES TO:) 1:17-MD-2804
The County of Summit, Ohio) Hon. Dan A.
et al. v. Purdue) Polster
7 Pharma L.P., et al.)
Case No. 17-OP-45004)
8 The County of Cuyahoga v.)
9 Purdue Pharma L.P., et al.)
Case No. 18-OP-45090)

10 TUESDAY, APRIL 30, 2019

11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
12 CONFIDENTIALITY REVIEW

13 - - -

14 Videotaped deposition of Thomas G.
15 McGuire, Ph.D., Volume II, held at the offices
16 of Robins Kaplan LLP, 800 Boylston Street,
17 Suite 2500, Boston, Massachusetts, commencing
18 at 8:31 a.m., on the above date, before
19 Carrie A. Campbell, Registered Diplomat
20 Reporter and Certified Realtime Reporter.

21 - - -

22 GOLKOW LITIGATION SERVICES
23 877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com
25

<p style="text-align: right;">Page 617</p> <p>1 A. No, this is my first public 2 nuisance venture. 3 Q. Prior to this engagement, have 4 you ever served as a testifying expert 5 offering opinions regarding a public 6 nuisance? 7 MR. SOBOL: Objection. Asked 8 and answered. 9 THE WITNESS: No, this is my 10 first public nuisance venture. 11 QUESTIONS BY MR. KEYES: 12 Q. Prior to this engagement, has 13 Compass Lexecon ever worked on a case 14 involving whether a public nuisance existed? 15 A. I don't know. 16 Q. Prior to this engagement, has 17 Compass Lexecon ever worked on a case 18 attempting to determine the magnitude of 19 harms or costs associated with the public 20 nuisance? 21 A. I don't know. 22 Q. Prior to this engagement, has 23 Greylock McKinnon Associates ever worked on a 24 case involving whether a public nuisance 25 existed?</p>	<p style="text-align: right;">Page 619</p> <p>1 discuss physicians being influenced by, 2 quote, "Detailing visits by representatives 3 of brand drug companies and other promotional 4 activities by drug companies." 5 Do you see that? 6 A. I see it. 7 Q. Have you studied detailing 8 visits by manufacturing defendants to 9 physicians? 10 A. Well, I've studied in a sense 11 of reading about it as part of my 12 professional -- 13 Q. Reading about them? 14 A. Yes, that's what I said. 15 Q. Okay. Have you done any 16 independent study yourself? 17 MR. SOBOL: Objection. 18 QUESTIONS BY MR. KEYES: 19 Q. Of detailing visits? 20 MR. SOBOL: Objection. 21 THE WITNESS: Okay. Well, I -- 22 in sort of a general term, that's an 23 independent study. It's me. It's 24 reading. That's a kind of study. 25 What I haven't done is</p>
<p style="text-align: right;">Page 618</p> <p>1 A. I don't know. 2 Q. Prior to this engagement, has 3 Greylock McKinnon Associates ever worked on a 4 case attempting to determine the magnitude of 5 harms or costs associated with the public 6 nuisance? 7 A. I don't know. 8 Q. In paragraph 21 of your report 9 on public nuisance -- 10 Are you there? 11 A. Yes, I'm here. 12 Q. -- you discuss physicians being 13 influenced by, quote, "Detailing visits by 14 representatives of brand drug companies and 15 other promotional activities by drug 16 companies." 17 A. Excuse me, I think I must be on 18 the wrong page. 19 Can you give me another -- 20 Q. Paragraph 21. 21 A. Paragraph 21. Okay. 22 Okay. 23 Q. Are you there? 24 A. Yes. 25 Q. Okay. In paragraph 21 you</p>	<p style="text-align: right;">Page 620</p> <p>1 independently assessed the empirical 2 connection between detailing visits 3 and sales or shipments. 4 QUESTIONS BY MR. KEYES: 5 Q. You say in paragraph 21, quote, 6 "In the context of prescription opioids, 7 manufacturers were purveying biased 8 information." 9 A. I'm sorry, you've lost me 10 again. 11 Q. You say in paragraph 21, "In 12 the context of prescription opioids" -- 13 MR. SOBOL: It's third line 14 down. 15 THE WITNESS: Okay. Okay. 16 QUESTIONS BY MR. KEYES: 17 Q. Okay. Have you studied what 18 false information was disseminated by 19 manufacturers to physicians? 20 A. Well, I'm relying on other 21 experts for making that determination. 22 Q. Who? 23 A. Well, as it says in the very 24 next sentence there, "As explained in the 25 expert report of Matthew Perri."</p>